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## **NOTICE OF MEETING**

### CABINET MEMBER FOR SAFETY IN THE COMMUNITY

FRIDAY, 14 JULY 2023 AT 4PM

### COUNCIL CHAMBER - THE GUILDHALL, PORTSMOUTH

Telephone enquiries to Jane Di Dino, Local Democracy Officer Tel: 023 9283 4060 Email: jane.didino@portsmouthcc.gov.uk

If any member of the public wishing to attend the meeting has access requirements, please notify the contact named above.

### Membership

Councillor Ian Holder (Cabinet Member)
Councillor Yinka Adeniran
Councillor Hannah Brent
Councillor Emily Strudwick

(NB This agenda should be retained for future reference with the minutes of this meeting).

Please note that the agenda, minutes and non-exempt reports are available to view online on the Portsmouth City Council website: www.portsmouth.gov.uk

Deputations by members of the public may be made on any item where a decision is going to be taken. The request should be made in writing to the contact officer (above) by 12 noon of the working day before the meeting, and must include the purpose of the deputation (for example, for or against the recommendations). Email requests are accepted.

### AGENDA

- 1 Apologies for Absence
- 2 Declarations of Members' Interests

# 3 Sampling plan in relation to the shellfish production areas within Portsmouth waters (Pages 3 - 24)

### **Purpose**

The purpose of this report is to advise the Cabinet Member for Safety in the Community of the current situation with regard to the sampling plan and responsibilities placed upon Regulatory Services (RS) in respect to live bivalve molluscs (shellfish).

# RECOMMENDED that the Cabinet Member for Safety in the Community:

- Recognises the importance of our work in monitoring the health of the shellfish population within our harbours and the benefits of such.
- Approves the resources (financial and staffing) within RS that are required to provide a continuation of the sampling programme.
- Approves Option 3 and the continuation of these activities.

Members of the public are permitted to use both audio-visual recording devices and social media during this meeting, on the understanding that it neither disrupts the meeting nor records those stating explicitly that they do not wish to be recorded. Guidance on the use of devices at meetings open to the public is available on the council's website and posters on the wall of the meeting's venue.

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## Agendantem 3



Title of meeting: Safety in the Community Portfolio Decision Meeting

Date of meeting: 14 July 2023

**Subject**: Sampling plan in relation to the shellfish production areas

within Portsmouth waters

**Report by:** Director of Culture, Leisure, and Regulatory Services

Wards affected: All

Key decision: No

Full Council decision: No

### 1.0 Purpose of report

1.1 The purpose of this report is to advise the Cabinet Member for Safety in the Community of the current situation with regard to the sampling plan and responsibilities placed upon Regulatory Services (RS) in respect to live bivalve molluscs (shellfish).

### 2.0 Recommendations

### 2.1 RECOMMENDED that the Cabinet for Safety in the Community:

- i. Recognises the importance of our work in monitoring the health of the shellfish population within our harbours and the benefits of such.
- ii. Approves the resources (financial and staffing) within RS that are required to provide a continuation of the sampling programme.
- iii. Approves **Option 3** and the continuation of these activities.

### 3.0 Background

- 3.1 RS is the Portsmouth Port Health Authority (PPHA or 'competent authority for official controls'). Part of the varied responsibilities of the PPHA is to carry out monthly bacteriological sampling of approved shellfish production areas in both Portsmouth and Langstone harbours.
- 3.2 The results obtained by the PPHA are used by the Food Standards Agency (FSA) to classify the production areas according to the *E.coli* levels in the shellfish flesh to ensure they meet the health standards laid down in EC Regulation 2019/627.



- 3.3 The classification protocol laid out in EC Regulation 2019/627 determines the areas where shellfish can be collected from and how the shellfish have to be treated after harvesting to ensure that they are safe to eat.
- 3.4 This assessment results in the classification of shellfish ('A', 'B', 'Long Term B' and 'C') which determines the level of treatment (e.g. purification, relaying, cooking) required before safe human consumption of the fish. Marine biotoxins which are produced by certain types of phytoplankton (marine algae) can accumulate in the tissues of filter feeding shellfish.
- 3.5 The consumption of shellfish which are contaminated with these biotoxins can lead to illness, ranging from sickness and diarrhoea to more serious conditions which could require hospital treatment. Certain concentrations of toxins (depending on the specific biotoxin) can be lethal. Shellfish are considered a high-risk food. The sampling frequency and location are determined and regularly reviewed by CEFAS (Centre for Environment Fisheries and Aquaculture Science).
- 3.6 EC Regulation 2019/627 also requires a monitoring programme of classified shellfish production areas to be established, as part of PPHA official controls, to check for the possible presence of marine biotoxins in the shellfish flesh. This sampling protocol is defined in the legislation and requires monthly sampling at a minimum of ten occasions over 12 months.
- 3.7 The PPHA is additionally responsible for implementing procedures in the event that contamination levels in shellfish beds exceed certain levels. The actions taken vary from further investigation of potential causes to the closure of the shellfish production areas depending on contamination levels.
- 3.8 The PPHA are responsible for informing industry and Local Action Group (LAG) members of the results and enforcement of control measures such as issuing Temporary Closure Notices (TCN) and temporary downgrades and regulation of Food Business Operators in their local area. We coordinate the LAG and Local Action Plan (LAP) for our area. The documented plan is referred to as the SLAP (Shellfish Local Action Plan).
- 3.9 The responsibility for classification or reclassification of a production area remains with the FSA in conjunction with Centre for CEFAS.
- 3.10 The economic value of the current classified areas is difficult to calculate. There are approximately 50 locally registered vessels operating within the PPHA area. The information provided by Southern Inshore Fisheries & Conservation Authority (SIFCA) with regard to catch landed in the Portsmouth water areas estimates the total amount to be approximately 70 Tonnes per annum. The estimated commercial value of these products being -Circa. £750,000.



- 3.11 Sanitary Surveys are required under EC Regulation 2019/627 relating to official controls on shellfish intended for human consumption. The surveys are intended to provide a thorough assessment of microbiological pollution sources in the harbours. Once the sources are located, they enable the development of the most representative sampling plan, identify appropriate production area boundaries and the most representative monitoring points (RMP) [i.e., where the PPHA are required to sample] for all shellfish production areas.
- 3.12 The end product microbiological criteria specified in EU Regulation 2073/2005 must be met. The production area will be classified as A, B or C, with A as the least and C as the most contaminated. The level of treatment required to remove contamination from the shellfish after harvesting depends on this classification. If contamination levels are consistently so high that a class C cannot be achieved, then harvesting from the area may be prohibited. The standards that must be achieved and the level of treatment required for each classification are:

**Class A -** Shellfish can be harvested for direct human consumption if the end product standard requirements are met.

**Class B -** Shellfish can be supplied for human consumption after one of three processes. The options are:

- o purification in an approved establishment.
- o relaying for at least one month in a classified Class A relaying area.
- o an EC approved heat treatment process.

**Class C -** Shellfish can only be sold for human consumption after completing one of three possible processes. These processes are:

- o relaying for at least two months in an approved class B relaying area followed by treatment in an approved purification centre.
- o relaying for at least two months in an approved class A relaying area.
- o after an EC approved heat treatment process.

**Prohibited areas -** Shellfish from areas with consistently prohibited level results must not be subject to production or be harvested.

3.12 Within the PPHA area the areas listed below in **Table 1** have classifications. These being species specific for that area. The classification for the beds are listed - B-LT refers to a Long Term (LT) classification (Stable compliance over 5 Years +). Further information and examples of the areas that are classified for commercial harvesting are detailed within **Appendix 1**.



### Table 1

Harbour	Location	Species	Classification
Langstone Harbour	South East	M. mercenaria	B-LT
	Langstone Harbour	(Hard clam)	
Langstone Harbour	Langstone Channel	O. edulis	В
		(Native oyster)	
Langstone Harbour	Langstone Channel	C. gigas	В
		(Pacific oyster)	
Portsmouth	East Harbour	M. mercenaria	B-LT
Harbour		(Hard clam)	
Portsmouth	West Harbour	M. mercenaria	B-LT
Harbour		(Hard clam)	
Portsmouth	West Harbour	O. edulis	B-LT
Harbour		(Native oyster)	
Portsmouth	West Harbour	C. gigas	B-LT
Harbour		(Pacific oyster)	
Portsmouth	Fareham Lake	M. mercenaria	В
Harbour		(Hard clam)	
Portsmouth	East Harbour	O. edulis	B-LT
Harbour		(Native oyster)	
Portsmouth	East Harbour	C. gigas	B-LT
Harbour		(Pacific oyster)	

### 4. Sampling costs

4.1 The samples are obtained on 12 occasions - one batch of samples per month across two days. The existing sampling plan entails 9 x samples of shellfish (flesh), 2 water samples and 1 x biotoxin sample being collected from agreed points across the Portsmouth waters. The collection is provided via a contract with a local fisherman, additionally RS is required to pay for specific suite of analysis for the E.Coli count. Costs are summarised in **Table 2** below.

Table 2

Collection contract - annual cost	£ 16,409.28
Laboratory Analysis £65.21 x 9(samples)	£ 7,042.68
= £586.89 per month (x12)	
PPHA Officer time (£80 per hour)	£ 13,440.00
2 days (14 hours per month)	
= £1120.00 per month (x12)	
Grand total	£36,891.96 per year

4.2 The planning, collection and processing of the samples requires officer time equivalent to 2 working days each month.



- 4.3 The contract for the collection includes labour costs (2 crew required) and fuel for the vessel. The costs have increased from the previous year in the region of 10 % (inflationary costs). The laboratory costs have also increased by a similar figure. This is expected to continue to rise each year for the foreseeable future.
- 4.4 The PHA have been in contact with other Authorities (including Canterbury and Fareham Councils) through regional groups that have duties to undertake shellfish sampling. It is widely accepted that the sampling programme is costly and time consuming.

### 5 Recommendation

5.1 Options:

**Option 1:** No longer support the shellfish sampling plan.

**Option 2:** Reduce the number of samples obtained per year (8 /10 per year).

**Option 3:** Continue with the existing sampling plan as per the recommendation.

### 5.2 **Option 1 - Implications**

- 5.2.1 The FSA require a minimum of 8 monthly sample results to maintain a B or C area classification and a minimum of 10 monthly sample results are required to maintain 'A' classification.
- 5.2.2 The expectation is that local authorities will plan to sample each bed every month as this build's contingency should any sample fail to be admissible, or sampling not take place due to unforeseeable circumstances (for example staff sickness, tide, or weather considerations).
- 5.2.3 Any reduction in sampling below the minimum requirement for the existing classification is likely to result in the area being de-classified by the FSA as to do otherwise could compromise the integrity of the control. A reduction in sampling below 10 samples per year over the most recent three-year dataset means that the site cannot be considered for any upgrade to classification A regardless of the water quality indicated.
- 5.2.4 If the shellfish beds were declassified, commercial harvesting would no longer be permitted. This would have an adverse effect financially on the local fishermen. In turn, this may also lead to illegal harvesting within these areas. With the beds not having monitoring undertaken there would be an increased risk to public health.
- 5.2.5 The current budget used for shellfish sampling purposes (£37K) could be used to reinvest in the service to improve the provision of services.



- 5.2.6 A further consideration is regard to the potential positive impact that allowing the beds to be unharvested would bring. With an increased population of Bivalve molluscs in the harbours this could lead to a positive impact on the water quality.
- 5.2.7 Bivalves filter algae and organic matter from the water column which can significantly improve water quality by reducing the turbidity (a measure of the amount of suspended material in the liquid). They are also known to remove excess nutrients from water, particularly nitrogen which at high levels can promote algal blooms.

### 5.3 Option 2 - Implications

- 5.3.1 As stated above, a minimum of 8 samples results are required per year (for B & C classification). The number could be reduced slightly from 12 to 8 per annum. The bulk of the cost with regard to sampling being the contract with the fisherman to obtain the samples. The contract could be renegotiated to the reduced number (potentially 30% reduction). The laboratory analysis costs would also be reduced. This would provide a saving of £2,347. In doing so there would be less data available on the bed conditions and there would be no contingency. Dropping below the required 8 samples could then lead to declassification.
- 5.3.2 The existing arrangement is also utilised at present to obtain seawater samples within the harbours. This is to gather additional data for the bathing water reporting. If the shellfish sampling was no longer being carried out, the method for obtaining these samples would need to be reviewed. If the harbour sampling for seawater quality were to continue, then extra costs may be incurred using an alternative contractor for this purpose.

### 5.4 Option 3 - No change

5.4.1 Continuation of the support for the sampling plan that is dictated by CEFAS. This enabling the classification of the beds by the FSA and the commercial harvesting to continue.

### 6 Consultation requirements

6.1 If Option 1 was to be implemented (to cease the sampling programme) then various parties would need to be consulted:

### **FSA (Food Standards Agency)**

The Food Standards Agency is the Central Competent Authority (CCA) with overall responsibility for the microbiological monitoring programme in England and Wales

**CEFAS (Centre for Environment Fisheries and Aquaculture Science)** 



The Governments Marine science experts that coordinate the shellfish sampling programme on behalf of the FSA

## SIFCA (Southern Inshore Fisheries and Conservation authority) Manage the exploitation of sea fisheries resources within their district.

### LHB (Langstone harbour board)

The Langstone Harbour Board is the statutory Harbour authority, local lighthouse authority, and pilotage authority for Langstone Harbour. It is in charge of safety and navigation and has responsibilities for the conservation of the natural environment.

#### Local fisherman

Approx - 50 registered in Portsmouth

### 7.0 Integrated impact assessment

7.1 The IIA is attached as **Appendix 2**.

### 8.0 Legal implications

- 8.1 If the duty of sampling were not to be followed and the beds declassified, then this is likely to lead to an increase in the illegal harvesting of shellfish. The products harvested would potentially end up in the food chain. With no monitoring being carried out the shellfish would represent a significant risk to health.
- 8.2 Illegal harvesting from areas without monitoring and classification is a major concern in other areas. There has been a recent multi agency operation in the Chichester harbour in an attempt to tackle the issue involving Chichester District Council, Sussex Police, the Food Standards Agency, National Food Crime Unit, Inshore Fisheries and Conservation Authority, and the Gangmaster Labour Abuse Authority, working together to tackle suspected harvesters and any businesses taking the illegal harvested products.
- 8.3 If the Council was not to fulfil its duty with regard to the sampling this could also lead to legal challenge from the interested parties within the fishing industry.

### 9 Director of Finance's comments

9.1 The continued activities proposed within this report will be funded from the existing service portfolio budgets, as approved by Full Council.

### 10. Director's comments

It is recognised that the harvesting of shellfish for supply into the food chain requires specific controls due to the nature of the product and the inherent



risks to public health. The areas within our Portsmouth waters that have classification provide a substantial income for the industry. Through continuation of the sampling programme, it supports industry by providing the legally required basis and necessary controls to allow harvesting to continue and safety in the food chain. The close working with agency partners such as the FSA, CEFAS and SIFCA must continue to ensure protection for the harbour habitat and monitor the sea resources.

I support the recommendation for Option 3 to Continue with the existing sampling plan as per the recommendation.

Signed by: Stephen Baily, Director of Culture Leisure, and Regulatory Services

### **Appendices:**

Appendix 1	CEFAS classification maps
	1a - Example of CEFAS classification Map for Langstone harbour - M.mercenaria
	1b - Example of CEFAS classification map for Langstone harbour - O.edulis
	1c - Example of CEFAS classification map for Langstone harbour - C.gigas
	1d - Example of CEFAS classification map for Portsmouth harbour - M.mercenaria
	1e - Example of CEFAS classification Map for Portsmouth harbour - O.edulis
	1f - Example of CEFAS classification Map for Portsmouth harbour - C.gigas
Appendix 2	Integrated Impact Assessment

# Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:



Title of document	Location
CEFAS (Centre for Environment Fisheries and Aquaculture Science) -Shellfish classification and microbiological monitoring	https://www.cefas.co.uk/shellfish
FSA (Food Standards Agency) - Shellfish classification	https://www.food.gov.uk/shellfish-classification
Carcinus Ltd - Water Quality Assessments	Shellfish Hygiene - Water Quality Assessments  - Carcinus Ltd
MMO (Marine Management Organisation) - UK Sea Fisheries statistics 2021	UK_Sea_Fisheries_Statistics_2021
Chichester District Council webpage - Chichester harbour	https://www.chichester.gov.uk/article/36856/Operation-Pearl-targets-illegal-harvesting-of-shellfish-in-Chichester-Harbour
Sussex express webpage - Illegal harvesting at Chichester harbour	https://www.sussexexpress.co.uk/news/people/c hichester-district-council-launch-operation-pearl- to-target-illegal-shellfish-harvesting-3817292
FSA Guidance document	Guidance for Local Action Groups
CEFAS - Bivalve cultivation site location criteria document	techrep136.pdf (cefas.co.uk)
Native Oyster Network	https://nativeoysternetwork.org

The recommendations set out above were approved/ approved as amended/ deferred/ rejected by the Cabinet Member for Safety in the Community on 14 July 2023.

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Signed by: Councillor Ian Holder, Cabinet Member for Safety in the Community





### Appendices to -

Sampling plan in relation to the shellfish production areas within Portsmouth waters.

### Appendix 1a

Example of CEFAS classification Map for Langstone harbour - M.mercenaria

Langstone Harbour 
M. mercenaria

Scale - 1:50000

For death of the Portanual Harbour map

Longstone Bridge

Car 1086 0045

For death of the Portanual Harbour map

Longstone Bridge

Langstone Bridge

Langston

Classification of Bivalve Mollusc Production Areas: Effective from 1 September 2022

The areas delineated above are those classified as bivalve mollusc production areas under Regulation (EU) 2019/627.

Further details on the classified species and the areas may be obtained from the responsible Food Authority. Enquiries regarding the maps should be directed to: Shellfish Microbiology, CEFAS Weymouth Laboratory, Barrack Road, The Nothe, Weymouth, Dorset DT4 8UB. (Tel: 01305 206600 Fax: 01305 206601)

N.B. Lat/Longs quoted are WGS84 Unless otherwise stated, non-straight line boundaries between co-ordinates follow the OS 1:25,000 mean high water line.

Food Authority: Portsmouth Port Health Authority

Appendix 1b

www.portsmouth.gov.uk
Page 13



Example of CEFAS classification map for Langstone harbour - O.edulis

# Langstone Harbour -O. edulis Scale - 1:50000 ANGSTONE 02 ISLAND Produced by the Centre for Environment, Fisheries and Aquaculture Science, Weymouth Laboratory Crown copyright and database right [2022]. Ordnance Survey Licence number [GD10000356745]. Prohibited Classification Zones: Class A ///// Class B Class C

LT Class B Classification of Bivalve Mollusc Production Areas: Effective from 6 October 2022

The areas delineated above are those classified as bivalve mollusc production areas under Regulation (EU) 2019/627.

Further details on the classified species and the areas may be obtained from the responsible Food Authority. Enquiries regarding the maps should be directed to: Shellfish Microbiology, CEFAS Weymouth Laboratory, Barrack Road, The Nothe, Weymouth, Dorset DT4 8UB. (Tel: 01305 206600 Fax: 01305 206601)

### N.B. Lat/Longs quoted are WGS84

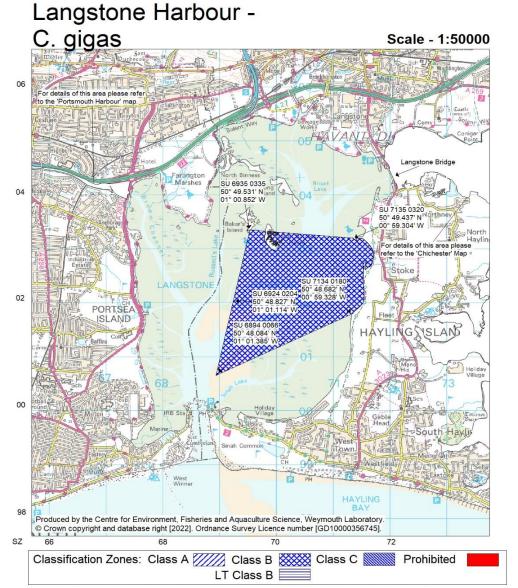
Unless otherwise stated, non-straight line boundaries between co-ordinates follow the OS 1:25,000 mean high water line.

Separate maps available for C. gigas and M. mercenaria at Langstone Harbour



### Appendix 1c

Example of CEFAS classification map for Langstone harbour - C.gigas



Classification of Bivalve Mollusc Production Areas: Effective from 6 October 2022

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Further details on the classified species and the areas may be obtained from the responsible Food Authority. Enquiries regarding the maps should be directed to: Shellfish Microbiology, CEFAS Weymouth Laboratory, Barrack Road, The Nothe, Weymouth, Dorset DT4 8UB. (Tel: 01305 206600 Fax: 01305 206601)

N.B. Lat/Longs quoted are WGS84

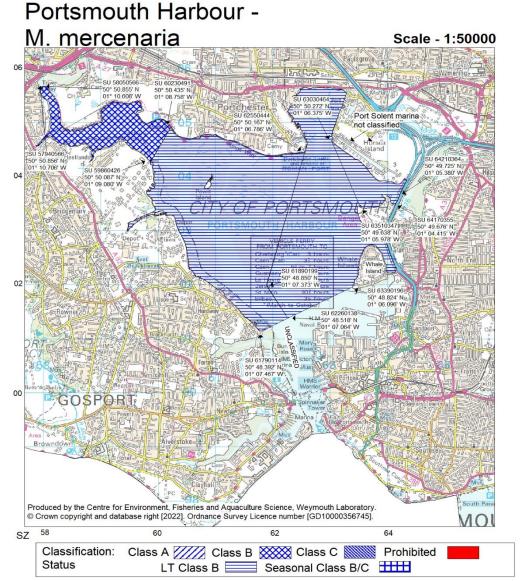
Unless otherwise stated, non-straight line boundaries between co-ordinates follow the OS 1:25,000 mean high water line.

Separate maps available for O. edulis and M. mercenaria at Langstone Harbour Food Authority: Portsmouth Port Health Authority



### Appendix 1d

Example of CEFAS classification map for Portsmouth harbour - M.mercenaria



Classification of Bivalve Mollusc Production Areas: Effective from 1 September 2022

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Further details on the classified species and the areas may be obtained from the responsible Food Authority. Enquiries regarding the maps should be directed to: Shellfish Microbiology, CEFAS Weymouth Laboratory, Barrack Road, The Nothe, Weymouth, Dorset DT4 8UB. (Tel: 01305 206600 Fax: 01305 206601)

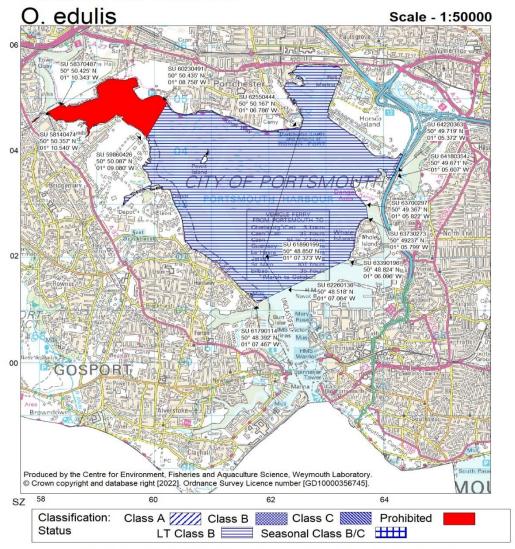
N.B. Lat/Longs quoted are WGS84 Unless otherwise stated, non-straight line boundaries between co-ordinates follow the OS 1:25,000 mean high water line.



### Appendix 1e

Example of CEFAS classification Map for Portsmouth harbour - O.edulis

### Portsmouth Harbour -



Classification of Bivalve Mollusc Production Areas: Effective from 1 September 2022

The areas delineated above are those classified as bivalve mollusc production areas under Regulation (EU) 2019/627.

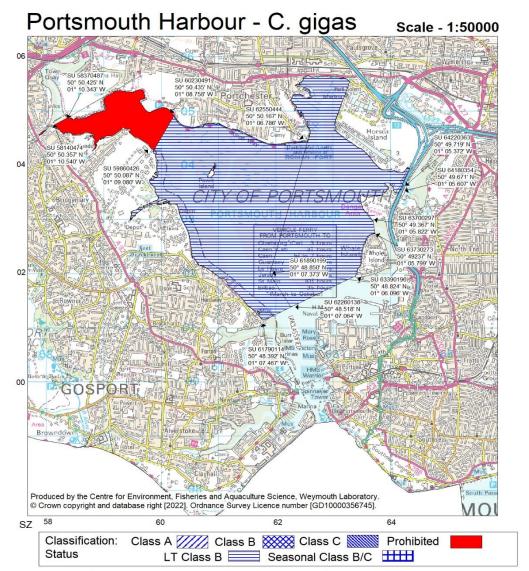
Further details on the classified species and the areas may be obtained from the responsible Food Authority. Enquiries regarding the maps should be directed to: Shellfish Microbiology, CEFAS Weymouth Laboratory, Barrack Road, The Nothe, Weymouth, Dorset DT4 8UB. (Tel: 01305 206600 Fax: 01305 206601)

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### **Appendix 1f**

Example of CEFAS classification Map for Portsmouth harbour -C.gigas



Classification of Bivalve Mollusc Production Areas: Effective from 1 September 2022

The areas delineated above are those classified as bivalve mollusc production areas under Regulation (EU) 2019/627.

Further details on the classified species and the areas may be obtained from the responsible Food Authority. Enquiries regarding the maps should be directed to: Shellfish Microbiology, CEFAS Weymouth Laboratory, Barrack Road, The Nothe, Weymouth, Dorset DT4 8UB. (Tel: 01305 206600 Fax: 01305 206601)

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Form name	Integrated Impact Assessment	
Reference	IA521030058	
Date	06/06/2023	



### **Policy details**

Request date	06/06/2023 17:29
Directorate	PCC Culture Leisure and Regulatory Services
Service	Port health
Title of policy, service, function	Sampling plan in relation to the shellfish production areas within Portsmouth waters
Type of policy, service, function	Existing
What is the aim of your policy, service, function, project or strategy?	Council decision
Has any consultation been undertaken for this proposal?	no

# Equality & diversity - will it have any positive/negative impacts on the protected characteristics?

This section is not	
applicable to my	
policy	

## Crime - Will it make our city safer?

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?	The paper is looking for support of the sampling programme in relation to shellfish in the Portsmouth waters. If the option of not continuing the sampling programme was pursued then this could lead to illegal harvesting within the area, as the beds would no longer be classified.
How are you going to measure/check the impact of your proposal?	The proposal is to continue with the sampling and monitoring of the shellfish.

### Housing - will it provide good quality homes?

This section is not applicable to my	
policy	

### Health - will this help promote healthy, safe and independent living?

This section is not applicable to my	
policy	

# Income deprivation and poverty - will it consider income deprivation and reduce poverty?

This section is not applicable to my policy	
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### Carbon emissions - will it reduce carbon emissions?

This section is not applicable to my	
policy	

## Energy use - will it reduce energy use?

This section is not applicable to my policy	
policy	

# Climate change mitigation and flooding - will it proactively mitigate against a changing climate and flooding?

This section is not applicable to my policy
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# Natural environment - will it ensure public spaces are greener, more sustainable and well-maintained?

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?	The monitoring of shellfish within the Portsmouth waters as required by CEFAS and the FSA provides information as to the conditions within the water - through monitoring of the water and shellfish.
How are you going to measure/check the impact of your proposal?	Results of the analysis are assessed by CEFAS and the FSA.

## Air quality - will it improve air quality?

This section is not applicable to my policy	
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Transport - will it make transport more sustainable and safer for the whole community?

This section is not applicable to my	
policy	

# Waste management - will it increase recycling and reduce the production of waste?

This section is not applicable to my policy	
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# Culture and heritage - will it promote, protect and enhance our culture and heritage?

applicable to my policy
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# Employment and opportunities - will it promote the development of a skilled workforce?

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?	The shellfish monitoring provides the required date for the area to be classified for shellfish harvesting. This provides controlled areas that Harvesters / Fishermen can collect product from.
How are you going to measure/check the impact of your proposal?	No further impact.

Economy - will it encourage businesses to invest in the city, support sustainable growth and regeneration?

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?	The continued legal harvesting of shellfish from Portsmouth waters.
How are you going to measure/check the impact of your proposal?	No further impact.

### Social value

This section is not applicable to my	
policy	

## Involvement

Who was involved in the Integrated impact assessment?	John Skinner , Richard Lee - Regulatory services
Name of the person completing this form	John Skinner
Date of completion	2023-06-06

