

Janet Finch-Saunders AM/AC

Assembly Member for Aberconwy
Aelod Cynulliad dros Aberconwy

Cynulliad
Cenedlaethol
Cymru
National
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Wales



Shadow Secretary for Local Government
Ysgrifennydd yr Wrthblaid ar gyfer Llywodraeth Leol

Lesley Griffiths AM
Cabinet Secretary for Environment and Rural Affairs
Welsh Government

By email

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Ref: TYH/JFS/HM
28th July 2017

National Assembly for Wales,
Cardiff Bay,
CF99 1NA.
0300 200 7454

Re: Harvesting of Razor Clams, Llanfairfechan

Dear Cabinet Secretary, Lesley,

I write regarding the harvesting of razor clams at Llanfairfechan, in my constituency of Aberconwy.

The mass harvesting of these clams has been a matter of concern for many residents and conservationists for a number of years, and I recently held a public meeting to gauge the local feeling and to enable a dialogue with officers of Welsh Government, Conwy County Borough Council, the Gangmaster and Labour Abuse Authority, and North Wales Police.

Certainly, the strength of feeling amongst the majority of those present at the meeting was clear. There are a number of serious concerns in regards to the mass harvesting of razor clams, and I write to you to formally request a number of actions be taken in this regard.

Concerns raised on this matter broadly fall into three categories:

1. Environmental/sustainability concerns

Constituents were primarily concerned with the sustainability of the clam beds, particularly given the scale on which the harvesting is taking place.

Under The Cockles and Mussels (Specified Area) (Wales) Order 2011, an individual may “take by hand not more than 5kg of cockles and 5kg of mussels during any one day”, however I note that this does not extend to cover razor clams. I would be grateful if you could clarify whether any such restriction exists with regards to the amounts of razor clams permitted to be harvested by an individual in any one day. If there is no current limit, I would be much obliged if you would consider the introduction of one, and advise as to how soon this may be introduced.

[Cont.]

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Janet Finch-Saunders will treat in confidence any personal information which you may pass on to her, and she will normally allow her staff to see it, so that they can consult with relevant authorities in order to help and advise you. We may wish to write to you from time to time to keep you informed on issues which you may find of interest. Please let us know if you do not wish to be contacted for this purpose.

Mi wnaiff Janet Finch-Saunders cadw unrhyw wybodaeth bersonol yn gwbl gyfrinachol, ac fel arfer mi fydd rhaid iddi rannu'r wybodaeth 'efo aelodau o staff i'w galluogi nhw i ddellio 'efo'r awdurdodau perthnasol er mwyn eich helpu a'ch cynorthwyo chi. Efallai mi fydd angen i rywun ysgrifennu atoch er mwyn darparu'r wybodaeth ddiweddaraf o bwys. Gadwch wybod i ni os nad oes diddordeb gennych mewn cael eich cysylltu at y diben hwn.

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Regardless of this, residents expressed their concern that people appear to be collecting considerably more than 5kg per day on an individual basis, and it is a considerable worry that the quantities being taken appear to be unknown.

Further to this, concerns were expressed that there appeared to be no certainty with regards to sustainability in this area, and that they would appreciate some reassurance on this matter. I understand, from the Welsh Government representatives present, that there is very little literature published with regards to razor clams. I therefore request that you seek to open discussions with the School of Ocean Sciences at Bangor University, with a view to commissioning a study into the sustainability of the razor clams and the clam beds at Llanfairfechan, and the affects of over-salting as a result of the harvesting.

(A study by the Worcester Polytechnic Institute, Massachusetts¹, found that “Razor clams cannot tolerate the highly concentrated [saline] solution so they are forced to move to an area of less concentration” – implying that over-salting of the bed may result in this body of razor clams, over the years, retreating to an alternative environment.)

Additionally, concerns were raised with regards to the spawning season for the razor clams, which I believe runs from May to September. I would be grateful if you could advise as to what consideration has been made of introducing a ban on harvesting during this period, as is common, for example, in the fishing of certain species of fish. Further, confirmation on how such a ban might be introduced, would be much appreciated.

Concerns were also raised with regards to the sand on the beach, with residents reporting a change in it this year – a number described it as being like “quicksand”. With regards to this, clearly the concern is that the decrease in the number of razor clams present is affecting the structure of the bed, and I would be grateful if you could ensure a suitable study into this worrying description is undertaken as soon as possible.

2. Reasons for picking/use of labour concerns

A number of residents raised their concerns that the razor clams were being harvested for commercial use, and I understand that some were not satisfied with the response provided by Conwy County Borough Council as to how those harvesting in large quantities were monitored. Certainly, there is a concern that large quantities of the clams are taken back and stored in

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¹ Kryzewski, P and Chery, J, 2005. Link: <https://web.wpi.edu/Pubs/E-project/Available/E-project-050305-123212/unrestricted/mqpdraft.pdf> [Accessed 28/07/2017]

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commercial kitchens. Whether this is for personal or commercial use, it is not clear, but I am concerned that even the storage of such clams in a commercial area may pose a food safety concern, given that they are harvested from a non-designated bed and are therefore not classified for commercial human consumption. I would be grateful if you could advise as to how this matter may be further investigated.

With regards to the people coming into the area for the specific purpose of harvesting, en mass, these clams, concerns have been expressed as regards potential labour abuse. Clearly, Wales does not wish to be home to a repeat of the tragic 2004 Morecambe Bay cockling disaster. Whilst I note that the Gangmaster and Labour Abuse Authority have reported no concerns in this regard, I would be grateful if you could confirm how you and your Cabinet colleagues are working with the police and relevant UK authorities to monitor this situation closely, to ensure abuse and safety concerns are of utmost priority.

3. Anti-social behaviour concerns

Finally, and linked with the abovementioned issues, concerns were raised with regards to some alleged anti-social behaviour, witnessed by residents, by those visiting to harvest. Whilst I appreciate that this remains a matter for the police to monitor, and respond to any reports of such incidents, I would be grateful if you could feed these concerns into any liaison with relevant bodies, as a number of locals reported their anxieties that this may be detrimental to the tourism industry, on which the town relies heavily.

The feelings of many residents on this matter were summed up by a gentleman towards the end of the meeting – they are proud of their community and area. They want to stand up for it, ensure it's sustainability, and protect this for future generations to come. With this in mind, I look forward to your detailed response on this matter, and confirmation with regards to the harvesting limit, a sustainability study and collaboration with Bangor University, investigation in to the reports of 'quicksand', reassurance on food safety and use concerns, and detail with regards to working with relevant bodies on the use of labour.

Yours sincerely,

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