

209 AT A MEETING OF THE TECHNICAL, SCIENCE AND BYELAW SUB-COMMITTEE  
held at 1, Preston Street, Carnforth on 10<sup>th</sup> February 2015

PRESENT – MEMBERS

Mr R. Graham	(Chairman)	MMO appointee (Fishing Industry – Cumbria)
Mr R. Benson		MMO appointee (Fishing Industry – North West)
Mr D. Harpley		MMO appointee (Marine Environment)
Mr T. Jones		MMO appointee (Aquaculture)
Councillor A. J. Markley		Cumbria County Council
Mr A. Newlands		MMO (Officer)
Mr R. Whiteley		Natural England (Officer)

IN ATTENDANCE

Mr S. J. Manning	MMO appointee
------------------	---------------

OFFICERS

Dr S. M. Atkins	Ms A. Leadbeater
Mrs I. V. Andrews	Ms M. Knott
Mr S. Brown	Ms S. Temple
Mr A. Deary	

APOLOGIES

Dr E. Baxter	MMO appointee (Marine Environment)
Dr J. Clark	MMO appointee (Marine Science)
Mr C. Lumb	Natural England (Officer)
Mr S. Mounsey	EA (Officer)

210 CHAIRMAN'S ANNOUNCEMENTS (Agenda Item 1)

1. The Chairman announced apologies and welcomed new member Mr A. Newlands (MMO Officer) who has replaced Mr R. Littleton.
2. The Chairman welcomed Mr Harpley who was deputising for Dr Baxter, Mr R. Whiteley deputising for Mr Lumb, and Mr S. Manning.
3. Agenda Item 6. Bass Update. Copy of the Agenda for a meeting to discuss bass management measures had been tabled.
4. The Chairman reminded members with a Pecuniary or Non-Pecuniary interest in Agenda items to complete the form being circulated by putting their names against any of the items on today's Agenda.

211 DECLARATIONS OF PECUNIARY AND NON-PECUNIARY INTEREST IN AGENDA ITEMS (Agenda Item 2)

Agenda Item 7. Byelaw Review. Mr R. Graham  
Agenda Item 8. Foulney Mussels. Mr R. Benson, Mr T. Jones, Mr S. Manning  
Agenda Item 9. Shellfish Working Group. Mr R. Benson, Mr T. Jones, Mr S. Manning

212 TO RECEIVE MINUTES OF THE TECHNICAL, SCIENCE AND BYELAW SUB-COMMITTEE MEETING HELD ON 31<sup>ST</sup> OCTOBER 2014 AND SPECIAL MEETING HELD ON 16<sup>TH</sup> DECEMBER 2014 (Agenda Item 3).

Mr Harpley said Dr Baxter has asked him to point out that she had raised the query on the resolution under Minute 183 of the TSB Sub-Committee minutes of 15<sup>th</sup> August and not Dr Clark. It was agreed to amend the minutes accordingly.

Acceptance of the minutes were proposed by Councillor Markley and seconded by Mr Benson.

RESOLVED

1. Following the amendment to change the name of Dr Clark in Minute 183 to Dr Baxter, that the minutes of the TSB Sub-Committee meeting held on 31<sup>st</sup> October 2014 be approved and signed as a correct record.
2. The minutes of the Special TSB Sub-Committee meeting held on 16<sup>th</sup> December 2014 be approved and signed as a correct record.

213 MATTERS ARISING (Agenda Item 4)

Minute 194(2). Matters arising from Special TSB Meeting held on 13<sup>th</sup> October 2014

1. Mr Jones raised a comment on the various references in the minutes to IFCA policy on hand gathering of intertidal shellfish. He was unable to find such a written policy and asked where it could be found. His understanding of the word 'policy' is that it should be a written document. Ms Knott said she had never used the term written policy. The line taken by IFCA on access to a resource has been discussed at numerous meetings and members of the Authority have always upheld that practice. Mr Benson suggested that it has always been more of a gentleman's agreement. Ms Knott agreed the term needed clarification and suggested it should be a matter for discussion by the proposed Shellfish Working Group. The Chairman said the question of access rights has been discussed at previous meetings and had also been referred to as legacy, historic rights and understanding. He also agreed that further discussion and definition of the word 'policy' was needed. (see note at end of minutes).
2. Mr Jones pointed out that he had provided scientific evidence of what fishing ephemeral seed mussel beds does if they are fished or not fished to the science team and other members of the TSB Sub-Committee. The only feedback he had received was from Prof Frid that the prosecution of a seed mussel resource in the Netherlands was equated with sustainability. Ms Knott said she had read the report and absorbed it but there are questions around this and she had been anticipating taking those forward to the Shellfish Working Group as a basis for discussion and informing that group.

Mr Jones raised a matter he felt more important relating to the final point made in Report No. 6 to the meeting of 31<sup>st</sup> October stating "the Authority had a duty to ensure sustainability compared with the impact of intertidal hand working". He asked for an explanation of the comment which was attributed to both the Senior Scientist and CEO. Ms Knott said that comment came from the CEO and not herself. The Chief Executive said he stood by that comment. He suggested that dredging a very large quantity per day and taking that out of the ecosystem is inevitably going to have a greater impact than a small number of hand gatherers taking away a relatively small amount from the environment. The Chairman suggested if there were concerns that seed mussel dredging is having an adverse effect there would need to be scientific evidence to back that up. Mr Manning said JNCC advice clearly states that mussel dredging causes both short term and long

term damage whereas hand gathering is relatively sustainable and environmentally friendly. Mr Whiteley said if an activity is having an impact there should be some kind of evidence or monitoring around that. Ms Knott suggested the proposed Shellfish Working Group would be the best forum for discussion of those issues where different interests can meet and hopefully come to some agreement for future planning of the use of the resource.

Mr Jones reported that he had recently attended a conference at which some interesting scientific advice referring to seed mussel survivability, how many are being lost within the first year of a seed mussel's life and he would be happy to share that information with whatever group is formed. He said there is a lot of scientific advice available which should be looked at by the Authority.

## 214 SCIENCE SUMMARY REPORT (Agenda Item 5)

Ms Knott presented the report outlining the work carried out by the Science Team over the last quarter and hoped this would help to answer questions about resourcing and capacity of the team to do the work. The report included information and updates on cockle and mussel fisheries within the District, Assessment of fishing activities in European Marine Sites, Biosecurity Plan, North West Coast Connections, PhD proposal with Lancaster University, Solway Energy Gateway and Shale Gas Exploration.

Members were updated on mussel fisheries in the area. The seed mussel fishery in the upper areas of the skear at Heysham Flat has finished. The lower skear areas beyond the Dallam Dyke area has persisted and appears to be developing into a size mussel fishery. Authorisations to fish the seed was revoked on 12<sup>th</sup> January and officers will be surveying the area shortly to see what stock remains. Hand gathering activity in the Duddon continues at a very low level. The hygiene classification for the bed has been downgraded from a B to a C and a number of hand gatherers have asked IFCA for assistance in getting it regraded back to a B. The Authority is limited in what it can do in a practical way to assist them and officers have advised them to contact the Environmental Health and Food Standards Agency.

A survey at Newbiggin in north Morecambe Bay was carried out following reports of cockle stocks there. The results of the survey show densities are extremely low, as is the case in a number of other areas around the Bay.

The Chairman asked if the approach for 2015 at Perch Scar would be the same as 2014 in that hand gatherers would be given an opportunity to fish there. Ms Knott said that came back to the question of policy raised earlier by Mr Jones. There is an urgent need for the formation of a working group to agree management of the Bay resource as a whole. Mr Manning suggested that fishermen in north Morecambe Bay may not wish to travel to Fleetwood as it would not be financially viable.

Solway Firth was surveyed last year and a stock of cockles was observed there. Cockles were also present on the Scottish side in the intertidal area and Marine Scotland is looking at the management of that resource. Officers have met with Marine Scotland on two occasions recently, the first meeting which also included NRW representatives, focused more on enforcement and sharing intelligence across the borders and building relationships between officers. The second meeting, which was held in Edinburgh, discussed joint approach to managing cockle and mussel resources in the Solway as a whole. Marine Scotland is able to put enormous resources into their survey work and the results of their survey are fed into a bird model developed by Bournemouth University to provide the TAC. The simplest and lowest run of that model costs around £8,000. With regard to stocks on the English side of the Solway, Officers are arranging to work with industry to carry out surveys to check how stocks have fared over the winter. Information has been collated from other sources about impacts of suction dredging and the actual mortality rates of cockles and there may be implications in terms of looking at the quality of the gear that the fishermen have in the Solway.

The Chairman raised a question about the comment in the report of the possibility of a suction dredge cockle fishery on the Middle Bank in the Solway Firth. He asked how that would be managed. Ms Knott said the activity has been managed in the past by setting a 1 tonne per day TAC which the local fishermen are happy with but it would be up to the Authority to decide on management.

European Marine Site work. Ms Knott reported that this work is ongoing and taking up a lot of officer time. Good progress is being made on a number of the assessments.

North West Coast Connections - National Grid Proposal for a tunnel under Morecambe Bay. Ms Knott reported that she attends regular meetings with National Grid. Consultation responses over the preferred route corridors are being collated. Three areas of concern relevant to the NWIFCA are detailed in the report, the first being the offshore option of taking the cabling out in the Irish Sea from Moorside to Heysham, Fleetwood or Blackpool which NG are not pursuing at present. The second is the proposal for a tunnel under Morecambe Bay which is still the preferred option for the southern stretch of the routing. Ms Knott requested NG to facilitate an early meeting with fishermen with relation to the positioning and size of the ventilation shafts and a meeting has been arranged for 16<sup>th</sup> February in Grange. The third is routing round the Duddon Estuary, around which there were a lot of concerns and this needs to be re-examined. Officers will keep members aware of progress and developments.

Solway Energy Gateway. There are a number of projects around energy generation, whether tidal barrages or other types of energy generation, along the North West coast and the Senior Scientist met with Nigel Catterson from Solway Energy Gateway Project to try and get a better understanding of the different projects. The Solway Energy Gateway Project is investigating the feasibility of installing an estuarine tidal energy capture between Annan and Bowness which has previously been bridged.

Councillor Markley reported on a conference he had recently attended on tidal energy and tidal barrages. There is a proposal for a tidal barrage off the west coast of Cumbria and he thought this was something the Authority should be investigating. Ms Knott said she was meeting with Roger Woods of Tidal Lagoon Power on the 13<sup>th</sup> February to discuss the proposal which was to construct a tidal lagoon from the Port of Workington and coming in at Dubmill Point for the generation of electricity. This is another big project that could get a lot of support. Ms Knott is also planning to attend another meeting this week in relation to the development of the Moorside Power Station.

Shale Gas Exploration. Ms Leadbeater has been in contact with Lancashire County council who have confirmed that current planning applications do not include horizontal drilling. IFCA is not currently a statutory consultee for this and officers have requested that the Authority be placed on the statutory consultee list.

## RESOLVED

The report be received.

### 215 BASS UPDATE (Agenda Item 6)

The Head of Enforcement reported there have been concerns about bass stocks for a while and pressure is building to improve the management of bass. The UK government requested the EU Commission to bring in emergency measures to deal with the situation and a ban on pelagic and mid water trawls was introduced. The prohibition includes the IFCA district and will run to 30<sup>th</sup> April 2015. However it is unlikely to have an impact on fishermen here as that kind of activity does not occur. Further measures proposed are for an increase in minimum landing size (mls) from 36cm to 42 cm, an increase in the mesh size from 90mm to 120mm, a catch limitation of 1.5 tonnes, improved nursery area protection and maintenance of the current pelagic prohibition.

With respect to bass nursery areas, Ms Knott said it had been suggested that not enough bass nursery areas have been identified and there were other areas that needed protection due to changes in bass populations.

Mr Manning suggested an increase in mesh size could result in salmon being caught in bass nets. IFCO Brown said an increase in mls could be brought in very quickly with small impact and relatively little cost but an increased mesh size could generate a lot of discussion and should not be brought in without consultation and discussion. Mr Deary agreed that a change in mls is the first thing that will be looked at. Ms Knott felt that a catch limit is likely to be set before mls as it will be easier to implement but as mentioned earlier in the discussions, a change in mesh size could have implications for salmon fishing. Discussions at past meetings had talked about a catch limit of 1½ tonnes and how that would impact on local fishermen. The Chairman said the recreational sector does not go unnoticed in terms of what is being caught which can be substantial. The problem lies in trying to enforce anything with unlicensed and unregistered boats that are actually fishing commercially but under the guise of catching for personal consumption. Ms Knott said maps show areas of main UK commercial fishing effort to be in the south. Any measures introduced will be on a national level but it is felt this is more of a problem in the southern fisheries

The Chief Executive reminded members he had tabled the Agenda for a meeting on 18<sup>th</sup> February arranged by Defra to discuss bass management measures which he is planning to attend. Members were asked to make him aware of any points they wished to raise at that meeting regarding specific local issues around bass in the North West.

#### RESOLVED

The report be received.

#### 216 BYELAW REVIEW – BYELAWS 2 AND 8 (Agenda Item 7)

The Chairman presented the report and suggested that members discuss Byelaw 8 (Prohibition of Foul Hooking) first and this was agreed.

Mr Deary reported that the new byelaw incorporates the old Cumbria Byelaw 17 and North West Byelaw 18 into one single byelaw. Officers are recommending members do not revoke Byelaw 5 of the byelaws inherited from the EA until the review of netting byelaws across the District has been completed. Byelaw 8 includes an exemption for the use of a gaff for the purpose of landing fish taken by an approved method of capture, for instance anglers on charter boats.

In response to a question from the Chairman on the EA byelaws IFCO Brown said two byelaws had been inherited from the National Rivers Authority in the English part of the District and one from the Dee, which were sea fisheries byelaws under EA legislation of all the waters of both the boundaries of the then Sea Fisheries Committees. The intention is to hold revocation of the EA byelaws as there are other sections, particularly relating to fisheries in the Dee, which have yet to be resolved. The new byelaw will parallel the existing Cumbria and North West byelaws and will apply to the whole District. It was agreed the proposed Byelaw 8 should be submitted to the March NWIFCA meeting to be 'made'.

With respect to the proposed Byelaw 2 on Vessel and Gear Restrictions, a draft byelaw has been presented to the TSB on previous occasions over the last 18 months. All the technical comments from MMO have been incorporated in the draft. The ethos of the byelaw, vessel and gear restrictions and historic access clauses remain the same. Following a number of meetings it has been decided that the mussel dredge fisheries would be better managed under separate byelaw. The rationale for each paragraph of the byelaw is given in Annex B to the report.

Ms Knott said some informal consultation on the byelaw had been carried out with industry and officers, following which further issues have arisen including proposed vessel length, areas, and the qualifying period for historical rights.

IFCO Brown referred to a map he had circulated showing the current vessel size restrictions for the various parts of the District. Mr Brown took members through this and described the vessel size for each area. The Dee does not have a vessel size but has certain quite tight gear restrictions. He suggested a further paragraph at 5(D) to cover new fishing gear technology and giving powers to authorise certain types of fishing gear. Members' views were sought in order to progress the byelaw as quickly as possible.

The Chairman asked with respect to historical rights how the evidence of track record could be proved. Mr Brown said the criteria had been taken from the old NWNWSFC Byelaw 9. Paragraph 11 would need re-working and members' comments were requested.

The Chairman said he would like to have seen a simpler presentation paper. He suggested the way forward was for a working party to discuss the draft and bring it back to the sub-committee for approval. The Chief Executive pointed out that a working party would take a lot of time to organise and the Authority does not have the resource for the organisation and administration of extra meetings being requested. He suggested re-drafting the byelaw taking account of comments received from members, industry and officers and carry out further consultation on the re-drafted byelaw.

The Chairman raised a point on paragraph 11(b) relating to evidence of historic access rights and asked if any evidence is available. Dr Atkins said there is a form of words in the NWIFCA Byelaw 6 which says "provided that evidence as agreed by the Authority to be sufficient is provided" and that form of wording is acceptable to MMO lawyers.

Ms Knott reiterated the earlier suggestion by the Chief Executive that Officers re-draft the byelaw, carry out further informal consultation with industry and bring a final draft to the next meeting of the sub-committee with the aim of submitting it to the June meeting of the Authority to be 'made'. Members were reminded that formal legal consultation would take place once the Authority has made the byelaw.

The Chairman said evidence of access could be frustrated by fishing patterns and gave examples of vessels from Maryport who often fish Wigtown Bay in SW Scotland for nephrops and not within the 3 mile limit of the NWIFCA District, or could be fishing for scallops in the Isle of Man waters during the winter so the qualifying for the 60 days in 24 months could be difficult. He said there is no doubt that boats have fished inside the 3 miles in the past.

Mr Jones said he was pleased that informal consultation has been carried but reinforced the Chairman's comments that the best way forward would be to continue doing that in a more robust manner. He felt liaising with people whose livelihoods are likely to be affected by the byelaw to make sure the Authority gets this right is a better way forward than the one being adopted at the moment.

#### RESOLVED

1. The report be received.
2. The draft Byelaw 2 at Annex A be re-drafted for further consultation and submitted to the next meeting of the TSB Sub-Committee.
3. The draft Byelaw 8 at Annex C be presented and 'made' at the March meeting of the Authority.

The Senior Scientist reported on the request discussed at the last meeting from hand gatherers to open an area for taking undersized mussel from the top part of the Foulney bed where mussel gets to a certain size and then becomes stunted. This is a matter which has been requested and reported on previously but officers were not able to progress that request for various reasons. Following the last meeting a HRA was carried out and agreed with NE with a view to looking at which tides the bed could be opened as this is a fishery that would be restricted by tidal heights to make it workable. A request was then received for a further area adjacent to the main Foulney bed which officers call Foulney "Ditch". Officers carried out inspections of the area and also other beds in Morecambe Bay to see what stock was available in terms of mussel resource for the birds for the rest of the winter. Most of the mussel has either been washed out or the remaining mussel is very small and has gone back very hard in the mud. Samples have been taken from various beds surveyed and from observations of the conditions the meat yield seems very low. Officers' recommendation is not to proceed with authorisation to remove stunted mussel in north Morecambe Bay at this time due to the lack of confidence that the fishery would not have an adverse effect on the bird features of the European Marine Site and members' approval of that recommendation is sought.

Mr Benson said in the actual Foulney Island area a lot of stock from the higher up ground has gone but there is a lot of stock remaining in the Foulney Ditch area. Ms Knott said her observations show that is the only area in Morecambe Bay at that tidal height that has any substantive quantity of mussels. If the bed is fished and the amount of food on that tidal height available for the birds is reduced, could result in a certain amount of bird disturbance and there will be nowhere else for the birds to feed on those heights.

Mr Manning said he did not accept the report. He had walked the Foulney Ditch area the previous day and had taken photographs of large, clean mussels there. The request from fishermen is for authorisation for a selective fishery to take mussels that are just undersize that will never grow to size. A lot of the stock is pearled and covered in barnacles and there are areas of both shell and mussel. No birds were present on the scar but he could see birds along the edges that seem to be feeding on sand where mussels had been removed last spring. The birds were not actually eating the mussels.

The Chairman pointed out the report puts forward the recommendation not to proceed with the authorisation to remove the stunted mussel. Mr Manning's comments seemed to be contrary to the science team's evidence as justification for not authorisation the activity. Mr Manning said perhaps the science officers have not looked at what the effect of actual fishing is going to be.

The Chairman reminded MMO appointees to the NWIFCA of their terms of reference when subjects are being discussed that they have a direct involvement in.

Mr Whiteley said he has not seen the HRA for this activity and asked what was being talked about in terms of a fishery, how many people, for how long, taking what kind of quantities and then to look at that as a number of disturbance days, as a proportion of the food that is missing and what the alternatives are. Ms Knott said a HRA for the activity has not been done.

The Chairman asked Ms Knott if she had heard anything different since she had given the report to alter the decision or recommendation. Ms Knott said she has not changed her conclusion that there is very little alternative resource in the Bay. Officers are not in a position at the present time to be able to react quickly to requests because of the need to bring matters back to members and also in carrying out HRAs. She felt the Shellfish Working Group will help to achieve that in the future, to have a management plan to enable officers to make decisions more quickly on how areas are to be harvested, which areas are to be harvested, by what method and how much because she fully understands the

fishermen's frustration. With respect to the comments about what oystercatchers are feeding on, the fact they are feeding on the mud would suggest there are no mussels there.

Mr Jones said it is not known exactly how many birds are there and what they are feeding on. The remit of this Authority is to champion the environment and also to maintain inshore industries, to strike a balance between people and birds. He suggested that more effort is put into this particular problem to make sure that the fishery is opened but it is not known if enough research has gone into the situation to make that decision yet. Ms Knott agreed but said another HRA would be needed to justify whether or not the fishery can be authorised, by which time the situation could have changed again.

The Chairman reminded members of the recommendation in the report and the evidence in that paper that the activity is not authorised. Members around the table are saying the reality of that particular area does not correspond with what is being said and it should be worked. If the evidence is not as conclusive as it should be, he asked how long it would take to get that evidence. If officers are convinced the situation has changed members would give that authorisation, if not the decision and recommendation should stand. Information provided by members is useful but more evidence is needed that that information is correct.

Mr Jones raised a query on paragraph 2 of the report regarding the HRA that had been carried out and the reference to the development of a template for use in future assessments of fisheries within Morecambe Bay. Ms Knott said that in line with the EMS work a more robust approach to HRA is required and that NWIFCA has been working to develop a template that can be adapted and used for future assessments in Morecambe Bay. Once that template is in place it will save time in the long term.

The Chairman drew members' attention to the recommendations and asked for members' agreement to this. At this point both Mr Manning and Mr Benson reported that the mussel in this area was not marketable at the present time and that they had no further interest in its harvest. Recommendations 1 and 3 were approved. With respect to Recommendation 2, following a vote of 3 for, 3 declared interest and 1 abstention the recommendation was agreed.

#### RESOLVED

1. The report be received.
2. Members approve the work of Officers.
3. Members approve the recommendation not to proceed with an authorisation to remove stunted mussel in North Morecambe Bay at this time.
4. Members approve that discussion about removal of stunted mussel in future years is incorporated into annual planning of the management of the Morecambe Bay mussel resource by the Shellfish Working Group.

218 The Chairman left the meeting at that point. Mr Jones, the Vice-Chairman, was asked to take over the Chair for the remaining Agenda item.

#### 219 SHELLFISH WORKING GROUP (Agenda Item 9)

The Chairman presented the report and reminded members of the purpose of this which is to provide members with the Terms of Reference for the proposed Shellfish Working Group. He drew attention to the two recommendations and asked for members' comments on the report. The Chairman said he agreed with the vision, also Objectives 1, 2 and 3 but he had reservations about 4 and 5. The status of the group would be non-decision making but would provide information and recommendations on the management of fisheries within the District to the TSB Sub-Committee, and ultimately the full Authority. He voiced



concerns that having to take recommendations to the TSB or Authority for decisions could prove cumbersome and he suggested this would not be the best way forward. Ms Knott said the Chairman's interpretation of the objective was different to what had been envisaged when she had prepared the report but agreed it sounded cumbersome and not workable. The intention was to formulate an annual management plan which would be submitted to the TSB once a year in an attempt to move away from the day to day management of resources. Contingencies would need to be built into the management plan to deal with any changes in fisheries that occur once the plan has been agreed.

Members discussed the Terms of Reference and an amendment proposed by Mr Whiteley to change Objective 2 to read "To balance the social and economic benefits of fisheries activities against the statutory duty to protect designated marine habitats and species from such activities" was agreed.

Dr Atkins pointed out the potential for this type of group has not been defined in the constitution and members may wish to make changes to the constitution that allows for it. He reminded members that a previous attempt to formulate a North West environmental committee had not found favour with some members of the Authority and had been abandoned. Dr Atkins further stated that the special TSB meetings such as the two arranged last year had put a lot of pressure on officers resulting in deadlines not being met and applications for authorisations not receiving a fast enough response. The Chairman suggested it might be appropriate for the Authority to look at amending the constitution to incorporate the type of activity proposed.

Members agreed that the aim of the group should be to develop management plans for all the District's cockle and mussel fisheries but Ms Knott felt initial priority should concentrate on the Morecambe Bay mussel fishery. Members felt the proposed title of the group may not be appropriate and it was suggested, and agreed, that it should be changed to Bivalve Mollusc Working Group.

The proposed membership of the group was discussed and it was agreed that officers should be asked to proceed with facilitating the establishment of the working group. Ms Knott confirmed that all interested parties would be made aware of the proposed group and representation from the different sectors would be invited.

#### RESOLVED

1. The report be received.
2. The title of the working group be changed to Bivalve Mollusc Working Group
3. Members approve the draft Terms of Reference for the Shellfish Working Group taking into account members' comments at today's meeting.
4. Members' approve Officers' proceeding to facilitate the establishment of the Shellfish Working Group.

There being no further business the Chairman thanked members for attending and declared the meeting closed at 1345 hours.

Officers have subsequently checked the definition of "Policy". The Dictionary defines the word as "a plan of action adopted or pursued by an individual, business etc" but it does not state this should be a written document.