

# PE2110/B: Protect wild wrasse stocks

## Petitioner written submission, 7 August 2024

We write in response to the Scottish Government submission of 22 July 2024.

SIFT (Sustainable Inshore Fisheries Trust) welcomes that the wrasse fishery was eventually brought into the licencing regime in 2021. However, the mandatory measures that were introduced are insufficient to ensure the sustainability of the fishery: they are simply the inadequate [previous voluntary measures put on a statutory footing](#).

Restricting creel numbers per vessel, as the Government has done, does not restrict fishing effort if there are inadequate limits on the number of vessels. The Government has not imposed a limit on the number of vessels, instead, it essentially determines numbers by whether wrasse licence applicants have a contract to supply wrasse to salmon farms. So, **the quantity of wrasse trapped is largely determined by how many contracts the salmon farming industry chooses to issue**, rather than by the stock of wrasse. This falls short of an evidence-based Total Allowable Catch (the recognised way of limiting the exploitation of a wild fish stock).

SIFT welcomed the introduction of mandatory minimum and maximum landing sizes in the wrasse fishery. However, the size limits are unchanged from when the salmon farming industry oversaw the fishery. It is notable that Scottish size limits are lower than in other jurisdictions. For example, [the Cornish IFCA set a minimum size for Ballan wrasse of 16cm](#), compared to 12cm in Scotland. The Scottish Government recognised in its wrasse consultation that the Scottish size limits are lower than elsewhere, and that concerns were raised that larger Ballan wrasse survive better in the salmon cages but **has not provided evidence to explain its lower landing sizes**.

Temporal management measures are also inadequate: the Scottish fishery is closed until 1st May - **before** the Ballan wrasse spawning and nest-guarding seasons end. Furthermore, there is evidence that other wrasse species' breeding seasons continue even later into the summer. Whereas [several wrasse fisheries managed by the Cornish IFCA are closed to the end of June](#), and [Devon and Severn closed all wrasse fisheries until the end of July](#). **SIFT believes the Scottish fishing season is determined by the aquaculture industry which seeks wrasse in May and June when sea lice in salmon farms are problematic**.

SIFT welcomes the belated introduction of mandatory data collection into the wrasse fishery. However, this data only raises our concern about the fishery's sustainability.

The data only provides partial information on wrasse landings. However, using total tonnages and the average weight of individual wrasse landed in 2021 and 2022, we estimate that **over 3.5 million wrasse were landed from 2017 to 2022**. Given their longevity, territoriality, breeding patterns and important ecosystem functions, this is extremely concerning. Furthermore, managing a fishery that removes millions of fish without knowledge of stock size **is inconsistent with the Scottish Government's obligation to meet the following UK Fisheries Act 2020 Objectives**:

- Sustainability: fish and aquaculture activities are environmentally sustainable [and] do not overexploit marine stocks;
- Precautionary: exploitation of marine stocks restores and maintains populations of harvested species above biomass levels capable of producing maximum sustainable yield;
- Ecosystem: fish and aquaculture activities are managed ... so as to ensure that their negative impacts on marine ecosystems are minimised;
- Scientific evidence: the management of fish and aquaculture activities is based on the best available scientific advice.

SIFT believes the Government's monitoring and analysis is insufficient to allow it to make any assertions about the fishery's sustainability. Additionally, it is vital to note that the relatively stable levels of wrasse being landed over recent years could be misinterpreted as indicating the fishery is sustainable: **stable landings are not an indicator of a sustainability** - catches can remain high while fish abundance declines. The Government cannot rely on the metrics it currently uses to show that the wrasse fishery is sustainable.

**The Government's failure to produce a Scottish Wrasse Fishery Management Plan (FMP) contrasts poorly with [DEFRA's forthcoming Wrasse FMP for English waters, which is being produced because of the "fishing industry and other key marine stakeholders ... concern relating to potential ecosystem impacts"](#)**. Given the 'potential ecosystem impacts' are analogous in Scottish waters, the Government's failure to commit to produce a Scottish Wrasse FMP raises further questions about its willingness to sustainably manage the fishery.

In addition to the Government's duties to manage wrasse for fisheries purposes, it has duties to manage wrasse because they form an integral part of protected Special Area of Conservation features. These duties stem from a requirement on regulatory authorities to achieve and maintain Favourable Conservation Status of Features listed in Annex 1 of the Habitats Directive, including "reefs". As part of this duty, the "typical species" of the protected features must be identified. A report commissioned - and accepted in March 2020 - by NatureScot but unpublished (albeit available following a FoI request) concluded that wrasse species should be considered typical species of reefs. Nature Scot's own Conservation Advice for the reef features of the Firth of Lorn SAC concurred with this.

Under the Conservation of Habitats and Species Regulations 2017, the relevant authority has a duty to assess the condition of Features, as informed by the status of their Typical Species every six years. This would include taking measures to restore wrasse populations where they have been depleted. These steps have not been taken.

SIFT is unconvinced by the Government's assertion that it "will introduce additional measures if the evidence suggests this is necessary". [The latest wrasse report illustrates that the Government does not gather sufficient evidence to enable effective decisions on management measures](#). We question what evidence, metrics and threshold values the Scottish Government will use to determine additional management measures.

SIFT also notes the Government's non-committal comments regarding inshore vessel tracking. SIFT is a member of the FMAC Inshore sub-group and has repeatedly sought assurance from the Government that the consultation "on a broad package of proposals" will include wrasse management. Given the nonspecific responses to our questions, we are unconvinced there will be any improvements to the wrasse fishery in the foreseeable future.